

Meeting Agenda

(w/ notes)

Meeting with RRTF to Discuss Ecological Assessment Revisions

December 17, 2002, 11 am, Room 1021C

Participants: Lois Rossi, John Leahy, John Hott, Eileen Gernhard

Purpose: Discuss and respond to RRTF's major concerns with EPA's revised comparative assessment.

RRTF's Major Concerns:

- Hazard versus risk assessment
 - Delete inappropriate references to risk
 - *Done. Have been careful to use "risk" or "potential risk only when exposure is a factor."*
 - Address use patterns and different formulations
 - *This is a preliminary assessment, and as such exposure is assumed rather than quantified. When more information on use patterns for different products and formulations is available, it will be considered.*
- Presentation of incidents
 - Remove misleading and inappropriate discussions of incidents
 - *Incidents are mainly used as evidence of exposure, not to quantify exposure. Characterization to this effect has been added. Also, have been careful to remove misleading implications of lethality. However, still note concern over potential sub-lethal effects.*
- The Decision Table Analysis
 - *To address concern over perception that title may imply risk management decision rather than risk analysis, have renamed it "comparative table analysis" and added characterization.*
- References to mitigation measures *All references have been removed.*
- Use of public participation process
 - *Since the REDs were issued we have publicly been committed to broad stakeholder involvement, and still believe that is the best approach for this project.*
 - *We do not believe another error review is necessary or productive. While the assessment has changed, the methodology, data used, and results are generally the same.*
 - *Major changes in response to RRTF input include:*

- *added characterization about exposure, and hazard versus risk*
 - *renamed the assessment (potential risks, comparative approach)*
 - *discussed uncertainties in data and results*
 - *added text to make clear what the assessment does and doesn't do*
 - *removed references to mitigation*
 - *emphasized that this is a preliminary assessment*
 - *highlighted information that could help refine the assessment*
- *Concern that other stakeholders need to be involved sooner than later.*
- The assessment as a basis for risk management decisions
 - *EPA rarely makes risk management decisions on preliminary assessments. We expect that as we go through the process, the assessment will be refined and we will have a document upon which to base a decision. This, being the preliminary assessment, is not that document.*
 - Make clear it is a preliminary assessment
 - *In the document, overview, summary, and response to comments this is clear. The FR notice will also make this clear. In addition, we have spoken to California, Canada, and the EU to make clear this is not the final word on rodenticide risks to non-targets.*
- Ensure goals of FIFRA are met, consider public health benefits
 - *When we have a more definitive risk analysis, if we reach a conclusion that mitigation measures are needed we will definitely consider the benefits. Stakeholders, including public health officials, will play a key role at that point, and we are anxious to involve them.*
- Coordinate rodenticide activities
 - *SRRD is coordinating with RD to reduce and eliminate redundancy.*
- Work with the RRTF
 - *We have taken comments and addressed them. We have accepted requests for meetings. We plan to continue to work with the RRTF.*

Next Steps

- Discuss changes with USDA / APHIS
- Update California and Canada on status
- Send courtesy copies of responses to comments to RRTF and APHIS
- Open public comment period and send courtesy copies of revised assessment to key stakeholders